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Attorneys for Plaintiff Sonos, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SONOS, INC.,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Case No. 3:21-cv-07559-WHA

**DECLARATION OF COLE B.
RICHTER IN SUPPORT OF SONOS,
INC.'S ADMINISTRATIVE MOTION
TO FILE UNDER SEAL DOCUMENTS
FILED IN SUPPORT OF SONOS'S
THIRD AMENDED COMPLAINT**

1 I, Cole B. Richter, declare as follows and would so testify under oath if called upon to do
2 so:

3 1. I am an attorney with the law firm of Lee Sullivan Shea & Smith LLP, counsel of
4 record to Sonos, Inc. ("Sonos") in the above-captioned matter. I am a member in good standing of
5 the Bar of the State of Illinois. I have been admitted *pro hac vice* in this matter. I make this
6 declaration based on my personal knowledge, unless otherwise noted. If called, I can and will
7 testify competently to the matters set forth herein.

8 2. I make this declaration in support of Sonos's Administrative Motion to File Under
9 Seal Documents Filed in Support of Sonos, Inc.'s Third Amended Complaint ("Administrative
10 Motion") ("Sonos's TAC").

11 3. As indicated in the Administrative Motion, Sonos seeks an order sealing the
12 entirety of Exhibits CC and CE. See the table in the Administrative Motion.

13 4. Exhibits CC and CE reference Sonos's confidential business information and
14 include confidential business agreements and licensing negotiations that are not public. Public
15 disclosure of this information would harm Sonos's competitive standing and its ability to
16 negotiate future business agreements because it would give competitors access to Sonos's
17 confidential business strategies. If such information were made publicly available, I understand
18 that Sonos's competitive standing would be significantly harmed. A less restrictive alternative
19 than sealing the highlighted portions of Sonos's TAC and the exhibits in their entirety would not
20 be sufficient because the information sought to be sealed is Sonos's confidential business
21 information but is integral to the defenses in Sonos's TAC.

22 I declare under penalty of perjury that the foregoing is true and correct to the best of my
23 knowledge. Executed this 8th day of July, 2022 in Chicago, Illinois.

24
25 /s/ Cole B. Richter

26 COLE B. RICHTER